

MEMO ENDORSED

ORIGINAL

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*Attorneys for Defendants Cleveland-Cliffs Inc and
 The Cleveland-Cliffs Steamship Company*

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

AMERICAN STEAMSHIP OWNERS
 MUTUAL PROTECTION AND
 INDEMNITY ASSOCIATION, INC.

Plaintiff,

v.

ALOCA STEAMSHIP CO., INC.
 and the Other Entities Listed on Exhibit A
 hereto,

Defendants.

CASE NO. 04 CV 04309 (LAK)

NOTICE OF MOTION
 FOR ADMISSION PRO HAC VICE

FILED
 2004 OCT -8 PM 3:34
 S.D. OF N.Y.

TO:
 Lawrence J. Bowles, Esq.
 Nourse & Bowles, LLP
 One Exchange Plaza at 55 Broadway
 New York, NY 1006-3030

and

SO ORDERED

LEWIS A. KAPLAN, USDJ

All Counsel of Record

and

All Unrepresented Defendants

PLEASE TAKE NOTICE that upon the Declaration of Dale A. Schreiber, executed on October 6, 2004, the affidavits of Gene B. George and Julia R. Brouhard sworn to on October 6, 2004, defendants Cleveland-Cliffs Inc, erroneously named as successor to Cleveland-Cliffs Steamship Company, and The Cleveland-Cliffs Steamship Company will move this court, located at 500 Pearl Street, Daniel Patrick Moynihan United States Courthouse, New York, NY 10007, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of Gene B. George, Esq., a partner in the firm of Ray, Robinson, Carle & Davies, P.L.L. and a member in good standing of the Bar of the State of Ohio and Julia R. Brouhard, Esq. a partner in the firm of Ray, Robinson, Carle & Davies, P.L.L. and a member in good standing of the Bar of the State of Ohio, as attorneys *pro hac vice* to argue or try, if necessary, this case in whole or in part as counsel. There are no pending disciplinary proceedings against Mr. Gene B. George or Mrs. Julia R. Brouhard.

Dated: October 6, 2004

PROSKAUER ROSE LLP

By: Dale A. Schreiber
Dale A. Schreiber (DS-9211)
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-and-

RAY, ROBINSON, CARLE & DAVIES,
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